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F. #2014R02068

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
- X

UNITED STATES OF AMERICA

- against -

ANTON BSHARA,

Defendant.

- X

INFORMATION

Cr. No. 17-009 (LDH)
(T. 18, U.S.C., §§ 982(a)(2), 982(b)(1), 1344, 2 and 3551 et seq.; T. 21, U.S.C., § 853(p))

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

At all times relevant to this Information, unless otherwise indicated:

I. The Defendant and Relevant Entities

1. The defendant ANTON BSHARA was a resident of Paterson, New Jersey.

2. Fidelity Investments ("Fidelity") was a financial institution as defined in Title 18, United States Code, Section 20. Fidelity offered Fidelity cash management accounts ("Fidelity accounts"), which were similar to traditional checking accounts, and enabled customers to withdraw money from their Fidelity accounts from automated teller machines ("ATMs"). The deposits of the Fidelity accounts identified herein were insured by the Federal Deposit Insurance Corporation.

3. Wells Fargo Bank, N.A. ("Wells Fargo") was a financial institution as defined in Title 18, United States Code, Section 20. The deposits of Wells Fargo were insured by the Federal Deposit Insurance Corporation.

II. The Fraudulent Scheme

4. In or about and between March 2015 and April 2015, the defendant ANTON BSHARA, together with others, participated in a fraudulent scheme involving the transfer of funds from bank accounts that belonged to other individuals or entities (collectively, the "victim account holders"), without their knowledge or consent, to Fidelity accounts in his own name. After fraudulently transferring the funds to his Fidelity accounts, BSHARA withdrew some or all of the money from bank ATMs and wired the funds to other bank accounts in his own name before the victim account holders could report the unauthorized transactions. As a result, Fidelity sustained a financial loss when it repaid the victim account holders for the losses caused by the foregoing fraudulent scheme.

5. On or about March 23, 2015, the defendant ANTON BSHARA opened three Fidelity accounts, including Fidelity accounts with account numbers ending in 6113 and 9524 ("Account-6133" and "Account-9524"). On or about April 2, 2015, BSHARA opened a Fidelity account with an account number ending in 8042 ("Account-8042"). All of BSHARA's Fidelity accounts were opened using his true name and address in Paterson, New Jersey.

6. After opening his accounts, the defendant ANTON BSHARA received the following wire transfers on or about the approximate dates set forth below from a Wells Fargo bank account with an account number ending in 4822, belonging to an individual ("Victim M.A."), whose identity is known to the United States Attorney:

Date	Approximate Amount	Receiving Account Information
March 23, 2015	$22,000	Account-6133
March 23, 2015	$10,000	Account-9524

Date	Approximate Amount	Receiving Account Information
March 24, 2015	$20,000	Account-6133
March 30, 2015	$20,000	Account-9524
April 6, 2015	$10,000	Account-6133

These transfers were executed without Victim M.A.'s knowledge or consent.

7. The defendant ANTON BSHARA also received the following wire transfers on or about the approximate dates set forth below from a Wells Fargo account with an account number ending in 7105, belonging to a company ("Victim Company 1"), an entity that is known to the United States Attorney:

Date	Approximate Amount	Receiving Account Information
April 2, 2015	$10	Account-8042
April 2, 2015	$30,000	Account-8042

These transfers were executed without Victim Company 1's knowledge or consent.

8. Upon receiving the funds discussed in paragraphs six and seven, the defendant ANTON BSHARA wired some of the money out of his Fidelity accounts on or about the approximate dates set forth below to accounts at other banks that had been opened using his true name and address:

Date	Approximate Amount	Receiving Account Information
March 31, 2015	$17,500	Citibank account ending in 0312
March 31, 2015	$2,000	Bank of America account ending in 5157

Date	Approximate Amount	Receiving Account Information
March 31, 2015	$1,500	Bank of America account ending in 5157
April 1, 2015	$6,500	Bank of America account ending in 5157
April 1, 2015	$6,500	Bank of America account ending in 5157
April 3, 2015	$3,000	Citibank account ending in 0312

9. In addition to the foregoing wire transfers, the defendant ANTON BSHARA withdrew from one or more of his Fidelity accounts a portion of the money received from Victim M.A.'s bank account from ATMs located in Brooklyn, New York, and elsewhere.

10. Following these transactions, Wells Fargo informed Fidelity that the transactions related to Victim M.A.'s account and Victim Company 1's account had not been authorized by the account holders. In response, Fidelity returned the funds to Wells Fargo. Due to the timing of the defendant ANTON BSHARA's wire transfers and ATM withdrawals of funds from his Fidelity accounts, those transactions resulted in a loss of approximately $27,000 to Fidelity.

11. On or about March 30, 2015, funds in the amount of approximately $100,000 were transferred from the Wells Fargo bank account of a company ("Victim Company 2"), an entity that is known to the United States Attorney, to a Fidelity account in the name of another individual ("Victim K.A."), whose identity is known to the United States Attorney. That wire transfer was executed without Victim Company 2's knowledge or consent. On or about April 5, 2015, approximately $50 was transferred from a TD Bank account registered to the

defendant ANTON BSHARA at his address in Paterson, New Jersey, to a second Fidelity account in the name of Victim K.A.

12. A web browser cookie was a small piece of data sent from a website's server that was stored in the internet user's web browser while the user was browsing the internet. Every time the user loaded a particular website, the user's browser sent information back to the website server, permitting the website server to, among other things, record the user's browsing activity. A common web browser cookie had accessed both Victim K.A.'s Fidelity accounts and BSHARA's three Fidelity accounts, indicating that the same web browser had been used to log into all of those Fidelity accounts. On this occasion, Fidelity was able to freeze the approximately $100,000 that was transferred from Victim Company 2's account to one of Victim K.A.'s Fidelity accounts before the funds were withdrawn or wired elsewhere.

BANK FRAUD

13. The allegations contained in paragraphs one through 12 are realleged and incorporated as though fully set forth in this paragraph.

14. In or about and between March 2015 and April 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ANTON BSHARA, together with others, did knowingly and intentionally execute a scheme and artifice to defraud one or more financial institutions, to wit: Wells Fargo and Fidelity, and to obtain moneys, credits and other property owned by and under the control of such financial institutions by means of materially false and fraudulent pretenses, representations and promises.

(Title 18, United States Code, Sections 1344, 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

15. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense.

16. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(2) and 982(b)(1); Title 21, United States Code, Section 853(p))

ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: [signature]
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136